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Attorneys for Defendants Atlantic Recording Corporation, Priority Records LLC, Capitol Records, Inc., UMG Recordings, Inc., BMG Music, Recording Industry Association of America, and Settlement Support Center, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

TANYA ANDERSEN,

CV No. 3:07-CV-934-BR

Plaintiff,

v.

**ATLANTIC RECORDING CORPORATION**, a Delaware corporation; **PRIORITY RECORDS LLC**, a California limited liability company; **CAPITOL RECORDS, INC.**, a Delaware corporation; **UMG RECORDINGS, INC.**, a Delaware corporation; **BMG MUSIC**, a New York general partnership; **RECORDING INDUSTRY ASSOCIATION OF AMERICA**; **SAFENET, INC.**, f/k/a **MEDIA SENTRY, INC.**, a Delaware corporation; **SETTLEMENT SUPPORT CENTER, LLC**, a Washington limited liability company,

Defendants'  
**APPLICATION FOR SPECIAL ADMISSION - PRO HAC VICE**

Defendants.

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As local counsel in the above captioned case and in accordance with LR 83.3, I am recommending the following attorney for admission *pro hac vice* and certify that the information contained in this application is true.

- (1) **Pro Hac Vice Attorney Certification:** I have read and understand the requirements of LR 83.3, and certify that the following information is correct:

(A) **Personal Data:**

Richard L. Gabriel  
Holme Roberts & Owen LLP  
1700 Lincoln Street, Suite 4100  
Denver, CO 80203-4541  
E-mail: richard.gabriel@hro.com  
Telephone: 303-866-0331  
Facsimile: 303-866-0200

(B) **Bar Admissions Information:** I certify that I am now a member in good standing of the following State and/or Federal Bar Associations:

- (1) State Bar of Colorado; State Bar of New York
- (2) New York State Courts
- (3) Federal Bar Admissions:

United States Supreme Court  
U.S. Court of Appeals, Fourth Circuit  
U.S. Court of Appeals, Fifth Circuit  
U. S. Court of Appeals, Ninth Circuit  
U.S. Court of Appeals, Tenth Circuit  
U.S. Court of Appeals, Eleventh Circuit  
U.S. District Court, District of Colorado  
U.S. District Court, Southern District of New York  
U.S. District Court, Eastern District of New York  
U.S. District Court, District of Maryland  
U.S. District Court, Central District of Illinois

(C) **Certification of Disciplinary Proceedings:**

X I certify that I am not now, nor have I ever been subject to any disciplinary action by any State or federal bar association or administrative agency; or

— I certify that I am now, or have been subject to disciplinary action from a State or federal bar association or administrative agency.  
(See attached letter of explanation.)

- (D) **Certification of Professional Liability Insurance:** I certify that I have a current professional liability insurance policy that will apply in this case, and that the policy will remain in effect during the course of these proceedings.
- (E) **Representation Statement:** I am representing the following party(s) in this case: Plaintiffs Atlantic Recording Corporation; Priority Records, LLC; Capitol Records, Inc.; UMG Recordings, Inc.; BMG Music; and Recording Industry Association of America.
- (F) **CM/ECF Registration:** Concurrent with approval of this *pro hac vice* application, I acknowledge that I will automatically be registered to access the court's Case Management/Electronic Case File system. (See <http://ecf.ord.uscourts.gov>). I also consent to electronic service pursuant to LR 5.5(a)(1).
- (2) **CERTIFICATION OF ASSOCIATED LOCAL COUNSEL:** I certify that I am a member in good standing of the Bar of this court, that I have read the requirements of LR 83.3(d), and that I will serve as designated local counsel in this particular case.

DATED this 9 day of October, 2007.

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Local Counsel  
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Applicant—Pro Hac Vice Counsel  
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**COURT ACTION**

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Application Approved Subject to Payment of Fees

Application Approved and Fee Waived

Application Denied

10-10-07

Date

*Anna Darrow*  
\_\_\_\_\_  
United States District Court Judge

cc: Counsel of Record

PAYMENT RECEIPT #

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2007, I caused to be served a copy of the foregoing APPLICATION FOR SPECIAL ADMISSION - PRO HAC VICE on the following person(s) in the manner indicated below at the following address(es):

Lory R. Lybeck, Esq.  
Benjamin R. Justus, Esq.  
Lybeck Murphy LLP  
7525 SE 24th Street, Suite 500  
Mercer Island, WA 98040-2334

Richard A. Adams, Esq.  
James C. Wyly, Esq.  
Patton, Roberts, McWilliams & Capshaw, LLP  
Century Bank Plaza, Suite 400  
2900 St. Michael Drive  
Texarkana, TX 75503

- by CM/ECF
- by Electronic Mail
- by Facsimile Transmission
- by First Class Mail
- by Hand Delivery
- by Overnight Delivery



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William T. Patton

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